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YELLOW MEDICINE SOIL AND WATER CONSERVATION DISTRICT

December 18, 2008

Conservation Technical Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence Avenue, SW., Room 6015-S
Washington, DC 20250-2890

Comments for Docket Number NRCS-IFR-08010

The Yellow Medicine Soil and Water Conservation District (SWCD) is a local unit of state government charged with carrying out programs for the protection and management of the soil, water and natural resources in our county. The SWCD as a locally lead organization works closely with the federal, state and other local agencies to provide technical assistance to landowners and operators to address natural resource issues.

On behalf of the Yellow Medicine Soil and Water Conservation District Board of Supervisors from Clarkfield, Minnesota, I would like to make the following recommendations to the State Technical Committee/Local Work Group Interim Final Rules:

- The District feels that it is extremely important that the Soil and Water Conservation Districts be allowed to continue to convene the Local Work Groups. The process of locally identifying important resource issues and addressing them with federal, state and local and private resources has been going on since the formation of the Districts. The programs provided by the Conservation Title and local work group process is the backbone of locally led conservation. We understand that with the new Farm Bill provision, the Local Work Group and the Stakeholder Input Group can be combined into one Local Work Group, convened by the local conservation districts, including all government officials and local stakeholders. The conservation districts are uniquely positioned to undertake the process of bringing everyone together to provide input. NRCS has established this process through past guidance and we feel it should continue under these new authorities and regulations.
- Regarding the interaction of the Local Work Group with the State Technical Committee and with NRCS, we do not feel it is appropriate to expect the State Conservationist to be present at all the Local Work Group meetings. We believe that NRCS should be represented by the District Conservationist. As subcommittees of the State Technical Committee, the Local Work Groups would provide a report to the State Conservationist and a summary of all Local Work Group meetings would be presented during the State Technical Committee.
- Regarding the report of the Local Work Group – we recommend that the Conservation Districts, as the convener of the Local Work Group, provide a report to the District Conservationist, the State Conservationist, and the State Technical Committee. Where the conservation district is not the convener, the designee by the State Conservationist should provide that report. If the recommendations from the Local Work Group are not incorporated into the USDA program delivery system, NRCS should inform the members of the Local Work Group as to the reasons behind that decision.

The Yellow Medicine SWCD would like to thank you for this opportunity to provide input on this regulation.

Sincerely,

Lou Ann Nagel
Yellow Medicine SWCD Manager

AN EQUAL OPPORTUNITY EMPLOYER